

ORIGINAL



0000163589



RECEIVED

2015 JUL -2 P 2: 26

AZ CORP COMMISSION
DOCKET CONTROL

Director
State Regulatory & Compliance

Mail Station 9712
PO BOX 53999
Phoenix, Arizona 85072-3999
Tel 602-250-4849
Gregory.Bernosky@aps.com

Arizona Corporation Commission
DOCKETED

JUL 02 2015

July 2, 2015

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

DOCKETED BY	MLB
-------------	-----

RE: Resource Planning and Procurement in 2016; Docket No. E-00000V-15-0094
Comments to Commissioners Doug Little's and Bob Burns' letters regarding IRP

Arizona Public Service Company ("APS") respectfully submits the following response to Commissioner Little's and Commissioner Burns' requests for comments regarding modifications to the Integrated Resource Plan ("IRP") process. APS would like to thank the Commissioners for the opportunity to discuss their proposals and appreciates how, under the Commission's leadership, utilities, stakeholders, Commission Staff and Commissioners have taken steps to develop more transparency and foster more open dialogue with each other regarding resource planning.

Commissioner Little has requested comments on extending the filing date for the utilities' next IRP to 2017. While APS does not anticipate needing additional time to prepare its 2016 IRP, APS understands the uncertainty regarding the final Clean Power Plan rules and the potential for substantial impacts on Arizona. As such, APS supports delaying the filing date to April of 2017.

Commissioner Burns has requested comments regarding changing the IRP filing cycle to every three years. Extending the filing cycle could allow additional time for analysis and potentially reduce the resource demands on the Commission and utilities for preparing and processing the IRPs. Alternatively, maintaining a two year filing cycle furthers the benefits of promoting collaboration and timeliness. APS would be interested in discussing how a three year filing cycle might be implemented, and how either a three year cycle, or continued modifications to the two year cycle, would enhance the dialogue and timeliness of information to improve the transparency that the Commission and Stakeholders have been requesting.

APS appreciates the Commission's interest in facilitating open communication and collaboration regarding resource planning and looks forward to continued dialogue regarding these issues.

Sincerely,

Gregory L. Bernosky

GB/kr

cc: Parties of Record

Copies of the foregoing delivered/mailed this 2nd
day of July, 2015, to:

Janice Alward
Legal Division
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

Dwight Nodes
Administrative Law Judge
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

Steve Olea
Utilities Division
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007